

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
)	
v.)	CASE NO. 2:07cr11-MHT
)	
KEVIN ONEIL BROWN)	
)	

MOTION TO CONTINUE CHANGE OF PLEA HEARING

COMES NOW the Defendant, **KEVIN ONEIL BROWN**, by and through counsel of record, and shows unto this Honorable Court as follows:

1. Undersigned counsel for the Defendant filed a notice of intent to change the Defendant's plea on March 29, 2007. This case is on the Honorable Myron H. Thompson's June 4, 2007, trial docket.
2. On the afternoon of March 30, 2006, undersigned counsel for the Defendant received an e-notice stating that the change of plea hearing would take place before the Honorable Wallace Capel, Jr. at 2:00 p.m. on April 5, 2007.
3. Undersigned counsel for Defendant Brown has a schedule conflict as he has a follow-up appointment with his personal physician at 1:00 p.m. on April 5th. This appointment has been postponed once before because of a court conflict, and cannot be postponed again because of the nature of the appointment.
4. Because this case is on the June 4, 2007 trial docket, there is ample time for the Court to proceed with its hearing on Defendant's notice of his change of plea.

5. The Government has been consulted and has advised the undersigned that there is no opposition to continuing this case for the reason asserted above.

WHEREFORE, Defendant Kevin Oneil Brown moves for an Order continuing his change of plea to the next available docket.

RESPECTFULLY SUBMITTED this 3rd day of April 2007.

s/ William R. Blanchard (BLA029)

Blanchard Law Offices

Post Office Box 746

Montgomery, Alabama 36101-0746

Phone (334) 269-9691

Fax (334) 263-4766

bill@blanchardlaw.com

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CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: AUSA Chris Snyder, and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: n/a.

Respectfully submitted,

s/ William R. Blanchard (BLA029)

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